



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F. #2011R00783

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Brooklyn, New York 11201

April 16, 2015

By E-mail

Michael Bachrach
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Steve Zissou
Steve Zissou & Associates
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Re: United States v. Agron Hasbjrami
Criminal Docket No. 11-623 (S-1) (JG)

Dear Sirs:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find additional discovery materials, consisting of subscriber records, bank records, travel records, and documents from the defendant's alien file, Bates-numbered 1137-1326.

The government has disclosed records custodian certifications in connection with discovery in this matter. Pursuant to Federal Rule of Evidence 902(11), the government hereby provides written notice that it may offer business records into evidence at trial using these certifications. The original records and certifications are available for inspection. The following table sets forth the records that correspond to each certification:

<u>CERTIFICATION</u>	<u>RECORDS</u>
Capital One (Aug. 25, 2011) (Bates No. 1245)	Bates No. 1238-1244
eBay (Sept. 20, 2011) (Bates No. 1259)	Bates No. 1260-1271
Google (Aug. 25, 2011) (Bates No. 1047)	Bates No. 1048-1051
Google (Aug. 25, 2011) (Bates No. 1231)	Bates No. 1232-1236
HSBC (Aug. 31, 2011) (Bates No. 1246)	Bates No. 1247-1258
JPMorgan Chase (Dec. 19, 2014) (Bates No. 1061)	Bates No. 1062-1120
Microsoft Corporation (Sept. 1, 2011) (Bates No. 1137)	Bates No. 1138-1192
Yahoo (Aug. 16, 2011) (Bates No. 1044-1045)	Bates No. 1046
Yahoo (Sept. 10, 2011) (Bates No. 1198-1199)	Bates No. 1200-1230

The government has disclosed various materials in the Turkish language during discovery in this matter. Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby notifies you that it intends to call Language Analyst Tulay Smartt of the Federal Bureau of Investigation to testify as an expert witness at trial. Analyst Smartt is expected to testify about her translation of Turkish-language materials from Turkish to English. A copy of Ms. Smartt's resume is enclosed.

The government has disclosed computer equipment and forensic examinations thereof during discovery in this matter. Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby notifies you that it intends to call Special Agent Stephen Flatley as an expert witness at trial. Special Agent Flatley is expected to testify about his imaging and forensic examination of the defendant's computer equipment. A copy of Special Agent Flatley's resume is enclosed.

The government previously seized various items from the defendant pursuant to court-authorized searches and at the time of his arrest, and made those items available for inspection. After the defendant's sentencing, the government returned certain items to the defendant or his designated recipient, at the defendant's request and pursuant to the Court's order. See ECF Nos. 47-55. The government recently recovered some of these items. A list of recovered items is enclosed; the items are available for inspection.

If you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

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Enclosure

cc: Clerk of Court (JG) (w/o enclosures)